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UBER TECHNOLOGIES, INC.;
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS CASES FOR
FAILURE TO COMPLY WITH PTO 31 AND
SHOW-CAUSE ORDERS**

This Document Relates to:

See Exhibits to Motion

Judge: Honorable Charles R. Breyer

DECLARATION OF CHRISTOPHER V. COTTON ISO
DEFENDANTS' MOTION TO DISMISS FOR FAILURE TO COMPLY
WITH PTO 31 AND SHOW-CAUSE ORDERS

DECLARATION OF CHRISTOPHER V. COTTON

I, Christopher V. Cotton, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Kansas City, Missouri. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Defendants”) Motion to Dismiss Cases for Failure to Comply with PTO 31 and Show-Cause Orders.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Defendants in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of Iowa, the Bar of the State of Missouri, and the Bar of the State of Wisconsin. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On September 9, 2025, this Court entered PTO 31, which required certain Plaintiffs to, within thirty days, either produce a bona fide ride receipt or serve a statement detailing their unsuccessful efforts to locate the receipt. ECF 3877. Uber also provided written notice to certain Plaintiffs of their obligations to comply with PTO 31 on September 12, 2025. On September 9 and September 22, 2025, this Court entered orders to show cause why plaintiffs should not be dismissed for submitting fraudulent receipts. (ECF 3876; ECF 3972). In addition to these written notices, on November 18, 2025, I also met and conferred with certain Plaintiffs’ counsel, including a representative of Plaintiffs’ Leadership, on a number of issues. During those discussions, I stated that Defendants would be moving to dismiss certain Plaintiffs subject to PTO 31 and show-cause orders.

I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is true and correct. Executed on November 21, 2025, in Kansas City, Missouri.

SHOOK, HARDY & BACON L.L.P.

/s/ Christopher V. Cotton

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